

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

SUZANNE COWAN
Plaintiff,

vs.

SENTRY INSURANCE A MUTUAL
COMPANY
Defendant.

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CIVIL ACTION NO. 4:17-cv-437-O

JOINT MOTION TO DISMISS WITH PREJUDICE

Plaintiff, Suzanne Cowan (“Plaintiff”), and Defendant, Sentry Insurance A Mutual Company (“Defendant”), jointly move to dismiss with prejudice all claims which either Plaintiff or Defendant have asserted, or could have asserted, against each other in this lawsuit. In support of this motion, Plaintiff and Defendant would show the following:

1.

Plaintiff and Defendant would show that a settlement has been reached between them as to all claims and causes of action which they have asserted against each other in this lawsuit. As Plaintiff and Defendant have settled all issues in this lawsuit as relating between them, Plaintiff and Defendant would now jointly move the Court to dismiss all claims Plaintiff has asserted, or could have asserted, against Defendant in this lawsuit, with prejudice to the refiling of same, and to dismiss all claims which Defendant has asserted, or could have asserted, against Plaintiff in this lawsuit, with prejudice to the refiling of same with all costs of court to be borne by the parties who incurred them.

For all of the above reasons, Plaintiff, Suzanne Cowan, and Defendant, Sentry Insurance A Mutual Company, request this motion be granted in its entirety, and that this Court enter an order dismissing all claims which Plaintiff has or could have asserted against Defendant in this lawsuit,

with prejudice to the refiling of same, and dismissing all claims which Defendant has or could have asserted against Plaintiff in this lawsuit, with prejudice to the refiling of same, with all costs of court to be borne by those parties who incurred them.

Respectfully submitted,

/s/Preston J. Dugas III
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CERTIFICATE OF SERVICE

This is to certify that on February 7, 2018, I electronically filed the foregoing document with the clerk of court for the U. S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the following attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means: Preston J. Dugas III, attorney for Plaintiff.

S/Russell J. Bowman
Russell J. Bowman